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EXECUTIVE OFFICE

City of Santa Fe Springs

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February 18, 2004

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Attention: Arthur G. Baggett, Jr., Chair

The City of Santa Fe Springs greatly appreciates the time and effort that the State Board's staff has invested in developing the Draft Functional Equivalent Document: Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List. We strongly support your goal of establishing a standardized approach for assigning water bodies to the 303(d) list and we endorse the inclusion of requirements for data quality and quantity, requirements for consistent and statistically valid data evaluation, and implementation provisions.

We further support the inclusion of a "planning/monitoring" list. The Draft December 2003 Listing Policy removed the "planning" and "monitoring" lists which were in the July draft policy. A planning list would be the most appropriate place for a number of listings currently on the 303(d) list, including those for which the pollutants causing impairments are undetermined, those for which data are insufficient to determine if impairment exists, and those for which water quality standards may be inappropriate. For instance, downstream from Santa Fe Springs, the San Gabriel River is listed for abnormal fish histology, algae, high coliform count, and toxicity. What are the pollutants causing these conditions? How can TMDLs be developed if the pollutants are unknown?

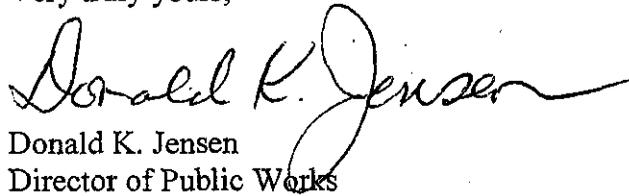
The City of Santa Fe Springs is concerned with provisions in the draft policy that would allow listings based on "pooled data." As currently written, a segment of a water body could be placed on the 303(d) list if only one sample from that segment exceeded water quality criteria and if samples in adjacent segments exceeded criteria. We request that the draft policy be amended so that each water segment is required to be evaluated independently.

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We recommend that the Board require re-evaluation of each water body identified on previous 303(d) lists. Many listings made on the 1998 and earlier 303(d) lists may be inappropriate because of inadequate data, evidence that natural sources have caused or contributed to the impairment, or the use of inappropriate water quality standards. This recommendation is consistent with the July 2003 draft policy and assists in prioritizing scarce state and local resources.

Thank you again for the opportunity to provide these comments.

Very truly yours,



Donald K. Jensen
Director of Public Works

DKJ/smc/mc

xc: Frederick W. Latham, City Manager